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USDA NATIONAL
ORGANIC PROGRAM

2005 JUN 28 P 2: 01

Townsend, Inc.
401 S. DuPont Highway
Georgetown, DE 19947
(302) 855-7100

June 27, 2005

Mr. Arthur Neal
NOP/USDA
Room 4008 – South Building
14000 Independence Ave, SW
Washington, DC, 20250

Dear Mr. Neal:

RE: Docket #Tm-04-07, NOP, Sunset Review

As you may, or may not, know Townsends, Inc is a producer of certified organic chicken for the past 4 years. Quality Assurance International has been our certifying agency. You may certainly check with QAI, but you will find that we conduct a good organic operation with very few issues.

Accordingly I would like to support the continued inclusion of the following items on the National List:

Section 205.603 Synthetic substances allowed for use in organic livestock production

- a. Disinfectant, sanitizer and medical treatments as applicable
 - 1. Alcohols as directed for disinfection purposes
 - 2. Aspirin for health care and to reduce inflammation
 - 3. Biologics to include vaccines
 - 5. Chlorine materials for sanitizing, but not to exceed level of safe water act
 - a. Calcium Hypochlorite
 - b. Chlorine Dioxide
 - c. Sodium Hypochlorite
 - 6. Electrolytes without antibiotics
 - 7. Glucose
 - 9. Hydrogen peroxide
 - 10. Iodine
- b. As topical Treatments, external parasiticide or local anesthetic as applicable
 - 1. Copper Sulfate
 - 2. Iodine
 - 3. Hydrated Lime
 - 4. Mineral Oil

d. Feed Additives

1. Trace minerals for enrichment or fortification when FDA approved
2. Vitamins used for enrichment or fortification when FDA approved

e. Synthetic inert ingredients as classified by EPA

1. EPA List 4-Inerts of minimal concern

205.605: Nonagricultural (nonorganic) substances allowed as ingredients in or on process products labeled as “organic” or “made with organic (specified ingredients or food group(s))”

a. Nonsynthetics allowed

1. Acids (Alginic; Citric produced by microbial fermentation and Lactic)
2. Calcium Carbonate
3. Calcium Chloride
4. Colors
5. Diatomaceous earth
6. Enzymes
7. Flavors must not be produced using synthetic solvents/artificial preservatives
8. Perlite for use as a filter aid in food processing
9. Potassium Chloride
10. Potassium Iodide
11. Sodium Bicarbonate
12. Sodium Carbonate
13. Tartaric Acid
14. Yeast

b. Synthetics allowed:

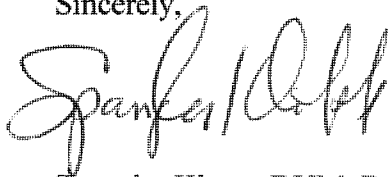
1. Ascorbic Acid
2. Calcium Citrate
3. Calcium Hydroxide
4. Calcium Phosphate
5. Carbon Dioxide
6. Chlorine materials to sanitize contact surfaces/compliance with clean water act
 - a. Calcium Hypochlorite
 - b. Chlorine Dioxide
 - c. Sodium Hypochlorite
7. Hydrogen Peroxide
8. Nutrient vitamins and minerals/21CFR 104.20
9. Ozone
10. Phosphoric Acid for cleaning purposes only
11. Potassium acid tartrate
12. Potassium Tartrate made from tartaric acid
13. Potassium Carbonate

14. Potassium Citrate
15. Potassium Hydroxide
16. Silicone Dioxide
17. Sodium Citrate
18. Sodium Hydroxide
19. Tartaric acid
20. Tocopherols
21. Sodium Chlorite (Sanova) an FDA approved food contact substance

205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))."

d. Cornstarch

Sincerely,

A handwritten signature in cursive script, appearing to read "Spangler/Klopp".

Spangler Klopp, DVM, Dpl ACPV
Corporate Veterinarian

Mr. Albert Moscona/QAI

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